

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MAXUS LIQUIDATING TRUST,

Plaintiff,

v.

GREENSTONE ASSURANCE, LTD.

Defendant

Case No.: 2:19-cv-401

**ORAL HEARING REQUESTED
JURY TRIAL DEMANDED**

**DEFENDANT GREENSTONE ASSURANCE, LTD.'S MOTION
FOR EXTENSION OF THE "JOIN ADDITIONAL PARTIES" DEADLINE**

Defendant Greenstone Assurance, Ltd. ("**Defendant**" or "**Greenstone**"), by and through undersigned counsel, files this Motion for an Extension of the Join Additional Parties deadline, seeking a two week extension (from May 21, 2020 to June 8, 2020), and respectfully states as follows:

1. Pursuant to the Court's Docket Control Order (ECF No. 34), the parties must join additional parties by May 21, 2020. Greenstone's ability to comply with this deadline is tethered, in significant part, to its review of the relevant documents.

2. While counsel for Greenstone has reviewed all documents in its possession, a large number of potentially relevant documents located in Bermuda are inaccessible because of COVID-19 government restrictions. As a result, counsel for Greenstone has not had the opportunity to review those documents, which will impact its analysis and determination of whether additional parties are necessary.

3. Based on the foregoing, Greenstone respectfully requests a brief extension through June 8, 2020 to comply with the “Join Additional Parties” deadline.

Dated: May 21, 2020

Respectfully submitted,

/s/ Lara Bach

Lara Bach (admitted *pro hac vice*)

Fla. Bar No. 086734

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Counsel for Defendant Greenstone Assurance, Ltd.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was filed electronically with the Clerk of the Court using CM/ECF on May 21, 2020. As such, the foregoing was served electronically upon all counsel of record.

/s/ *Lara Bach*

Lara Bach

CERTIFICATE OF CONFERENCE

The undersigned certifies that on May 21, 2020, counsel for Greenstone attempted to meet and confer with counsel for Plaintiff via email and telephone but was unable to make a connection. Counsel for Greenstone will continue its attempts to confer with Plaintiffs' counsel and will supplement this certificate of conference as soon as the parties have had an opportunity to confer.

/s/ *Lara Bach*

Lara Bach